



February 17, 2022

Mr. Erik Ekdahl
Deputy Director, Division of Water Rights
State Water Resources Control Board
P.O. Box 100
1001 I Street
Sacramento, CA 95814

RE: Proposed Reductions in Water Supply from the Mono Basin

Dear Mr. Ekdahl:

The South Orange County Economic Coalition (SOCEC) is pleased to provide comments regarding the request from the Mono Lake Committee that the State Water Resources Control Board (Water Board) take emergency action to prohibit the Los Angeles Department of Water and Power (LADWP) from utilizing the City of Los Angeles' water rights in the Mono Basin. We are concerned that a prohibition would further disrupt California's already strained water resources and have a deleterious impact on water supply overall. SOCEC represents businesses and government agencies in the south Orange County area. The water agencies in our area are members of the Municipal Water District of Orange County (MWDOC) which, in turn, is a member of the Metropolitan Water District of Southern California (Metropolitan) which supplies water from the State Water Project (SWP) and the Colorado River Aqueduct (CRA) to our members.

Reducing or eliminating Mono Basin imports to Los Angeles could negatively impact future opportunities to take advantage of winter storms to store water in available existing and future planned water storage facilities in southern California and prepare communities for localized climate-driven extremes of the wet and dry cycles and supply constraints elsewhere in the system. As the Water Board evaluates LADWP's water rights, we urge you to consider a balanced approach that provides flexibility to preserve water supply options and the protection of the environment before taking any actions. Restricting Los Angeles' already limited water supply from the Mono Basin will have a significant impact on southern California residents.

Last year and in early 2023, the State announced significant reductions in SWP allocations to a number of southern California agencies that rely specifically on the SWP. Metropolitan borrowed water from DWR to meet the human health and safety needs of SWP-dependent agencies. Maintaining Los Angeles' ability to utilize its full Mono Basin water rights is paramount to LADWP in reducing its reliance on Metropolitan's SWP supplies and making those supplies available to other agencies. Additionally, there is no guarantee that LADWP will be able to purchase water from other sources to replace supplies from the Mono Basin if there are further restrictions.

In December 2022, Metropolitan declared a regional drought emergency which called upon all its 26 member agencies (including MWDOC) to enhance their conservation actions to reduce usage of imported supplies from both the SWP and CRA. Metropolitan is continuing to allocate supplies for its SWP-dependent agencies and will consider implementing a regional Water Supply Allocation for all member agencies starting July 2023.

Despite these efforts, conservation alone is not enough to ensure consistent water supply for Southern California, especially for the mostly urban areas in the City of Los Angeles where water usage is for Human Health and Safety and less opportunities to reduce water usage through outdoor irrigation conservation.

California is in an increasingly difficult position. The impacts from climate change will continue to cause uncertainties. LADWP has already taken action to protect the environment by reducing water imports from Mono Lake tributary areas by 90 percent. Any further restrictions to LADWP's utilization of its water rights in the Mono Basin will have a significant impact throughout the region, especially in the SWP-dependent areas. As the State Water Board evaluates LADWP's water rights, again, we urge you to consider a balanced approach that provides flexibility to preserve water supply options and the protection of the environment before taking any actions.

Sincerely,

Victoria Hernandez
Executive Director

